

## **REMARKS/ARGUMENTS**

Applicant thanks the Examiner for extending the courtesy of an interview on April 8, 2004. As requested, the content of the interview is summarized below.

As Applicant has not amended the specification, no new matter has been added.

### **The Rejections Under 35 U.S.C. § 103(a)**

Applicant respectfully submits that the cited art does not contain the teachings asserted by the Examiner. More specifically, *Harvey*, *Menzies*, and *Ismael* do not teach the creating of a protocol-specific object by a repository API, or returning this object to a CIM object manager, as is claimed by the Examiner.

#### **Harvey**

The Examiner asserts that *Harvey* teaches the creation of a protocol-specific object, and the returning of this object to an object manager. Applicants respectfully disagree with this interpretation, noting that *Harvey* teaches the requesting of existing objects, *but not the creation of new ones by a repository API*. Additionally, because *Harvey* does not teach the creation of new objects, it cannot teach the returning of these created objects to an object manager.

*Harvey* teaches a distributed data processing system that allows client computers 11 to request objects, but not to create new ones. Objects may reside on clients 11 or servers 10 (Col. 3:26-31). One server 10 maintains a naming service 13 that associates each object in the system with one or more protocol towers, which are simply lists of objects and their associated addresses and protocols (Col. 3:26-27; 4:61-66). When a client node 11 requires access to an object, it first downloads the appropriate protocol tower from the naming service 13 (Col. 4:61-66). The client 11 then checks the downloaded protocol tower to determine whether it is able to communicate in the protocols of the objects within that tower (Col. 5:7-14). If so, the address and protocol information of the object is retrieved from the tower, allowing the client 11 to communicate with the object (Col. 5:14-24).

*Harvey* therefore discloses a computer system that allows client computers 11 to request, and communicate with, existing objects. *Harvey* does not disclose a repository API, let alone one that creates new objects. Additionally, because *Harvey* does not teach an API that creates new objects, it also does not teach returning such a created object to a CIM object manager.

### *Menzies*

*Menzies* does not make up for the deficiencies of *Harvey*. *Menzies* teaches a method and system for mapping management information bases (MIB) objects to object classes. Specifically, objects are determined to correspond to a scalar collection (one unique instance), or a table collection (multiple possible instances) (*See* Summary). If the MIB object corresponds to a scalar collection, it is mapped to a singleton managed object format (MOF) class (Id.). If the MIB object corresponds to a table collection, it is mapped to a different class that is capable of describing a plurality of instances, such as a keyed MOF class (Id.).

*Menzies* simply discloses the mapping of objects. Accordingly, like *Harvey*, *Menzies* does not disclose the creating of objects by an API, or the returning of these created objects to a CIM object manager.

### *Ismael*

*Ismael* also suffers from the same deficiencies as *Harvey* and *Menzies*. *Ismael* teaches a network management system that translates commands and uses them to manipulate an existing object. Core management services 25-28 and m-beans 29, which are simply objects (Col. 6:18-25), each operate according to a specific protocol, such as HTML/HTTP, SNMP, etc. (*See, e.g.*, Col. 8:17-19). Commands are first sent to servers 32, 34, 36, 38, where they are translated to conform to that server's protocol (Col. 8:1-7). The server then operates on the appropriate object, via a framework 24, according to the translated command (Col. 6:39-47).

The system of *Ismael* simply translates commands and manipulates an existing object accordingly. The system of *Ismael* does not create objects, nor does it return them to a CIM object manager.

Because the cited references do not contain all the teachings asserted by the Examiner, the rejection of claims 1-17 is unsupported by the art. Applicant thus respectfully requests that the rejections of the claims be withdrawn. Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the

Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at (650) 314-5322.

Respectfully submitted,

BEYER WEAVER & THOMAS, LLP

A handwritten signature in black ink, appearing to read 'Jon Y. Ikegami', written in a cursive style.

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